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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BRIAN HEBERT,

Plaintiff,

vs.

THE LITIGATION DOCUMENT GROUP,  
INC., a Domestic Corporation; CRAIG  
RENARD, an individual; DOES I through  
X, inclusive; ROE CORPORATIONS I  
through X, inclusive,

Defendants.

Case No.: 2:17-cv-01536-KJD-CWH

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR FILING  
JOINT PRETRIAL ORDER FOR FOURTEEN (14) DAYS  
(First Request)**

Pursuant to LR 26-4, the Parties hereto, by and through their attorneys of record, respectfully submit their Stipulation and Order to Extend Deadline for Filing Joint Pretrial Order For two (2) weeks. In support of this stipulation, the parties submit the following:

A. Current Deadline for filing Joint Pretrial Order:

This Court entered an Order (#50) granting in part and denying in part Defendant's Motion for Summary Judgment (#43) on January 29, 2019 making the current due date for submitting the Joint Pretrial Order **February 28, 2019**.

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B. Reasons why the existing deadlines cannot be satisfied.

During the preparation of the Joint Pretrial Order, approximately one week prior to the current deadline, counsel for Plaintiff learned that Defendant The Litigation Document Group Inc. has been dissolved, and that a new corporation, Litigation Discovery Group Inc. has been formed by Defendant Renard. As a result, the parties continue to discuss agreements regarding facts and exhibits that will streamline the trial of this matter.

C. Good cause exists for requesting the extension.

Pursuant to LR 26-4, a stipulation to extend a deadline set forth in a discovery plan made within 21 days of the subject deadline must be supported by a showing of good cause. As set forth above, during the preparation of the Joint Pretrial Order, approximately one week prior to the deadline, counsel for Plaintiff learned that Defendant The Litigation Document Group has been dissolved, and that a new corporation, Litigation Discovery Group has been formed by Defendant Renard. As a result, the parties continue to discuss agreements regarding facts and exhibits that will streamline the trial of this matter. In addition, the Plaintiff is investigating what additional action, if any, might be appropriate under the circumstances. Accordingly, good cause exists for the requested extension.

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D. Proposed schedule for remaining deadlines:

Last day to file joint pretrial order: The deadline to file the joint pretrial order is currently scheduled for March 1, 2019. The parties stipulate to extend the deadline to file the joint pretrial memorandum for fourteen (14) days to **March 14, 2019**.

**IT IS SO STIPULATED.**

Dated this \_\_\_\_ day of February, 2019.

Dated this \_\_\_\_ day of February, 2019.


MUSHKIN CICA COPPEDGE

LEAH MARTIN LAW

/s/ L. Joe Coppedge  
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IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE  
DATED: 3/1/2019